



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Natural Resources

OFFICE OF THE COMMISSIONER

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Rob Hajdú
Canadian Environmental Assessment Agency
410-701 West Georgia Street
Vancouver, British Columbia V7Y 1C6
Submitted via email to Rob.Hajdu@ceaa-acee.gc.ca

Re: Brucejack Gold Project Draft Environmental Assessment Report

Dear Mr. Hajdú,

The State of Alaska (State) has reviewed portions of the Brucejack Gold Mine Project Draft Environmental Assessment Report (DEAR) prepared by the Canadian Environmental Assessment Agency (CEAA). State subject-matter experts from the Alaska Departments of Natural Resources, Fish and Game, and Environmental Conservation focused their review on CEAA's assessment of potential adverse environmental impacts to surface water quality and fish habitat in the Unuk River. Please consider the following consolidated comments in your decision for the Brucejack Gold Project.

General Information

The Brucejack Gold Project (Project), proposed by Pretium Resources Inc. (Project Proponent), is located in northwestern British Columbia (B.C.), approximately 65 km north of Stewart, B.C., and 53 km upstream of the border with Alaska (via the Unuk River, Sulphurets Creek, and Brucejack Creek).

The Project is located in the Regional District of Kitimat-Stikine, which is the same region as the proposed Kerr-Sulphurets-Mitchell (KSM) Project.

The Project is proposed as an underground gold mine with a 22 year mine life producing 2,700 tons per day of ore using a long-hole stoping mining method. Mineral processing will involve conventional sulfide flotation with gravity concentration. A flotation plant will produce gold-silver concentrate that will be dewatered and trucked off-site for final process and smelting into doré.

Approximately 8 million tons of tailings and 1.9 million tons of waste rock will be backfilled into the underground mine stopes as a paste.

Approximately 2 million tons of potentially acid generating (PAG) waste rock will be placed in the southwest corner of Brucejack Lake, alongside approximately 8 million tons of tailings. At

closure, the PAG waste rock will be capped with non-PAG rock and a minimum of 1 meter water depth will be maintained over the waste rock. No tailings dams are proposed as part of the Project.

Fisheries and Fish Habitat

The Project Proponent proposes to store mine tailings and waste rock in the non-fish bearing 85 meter (m) deep glacial-fed Brucejack Lake, located 1,400 m above sea level. Brucejack Lake discharges into Brucejack Creek, passes beneath the Sulphurets Glacier, and discharges into Sulphurets Creek, a tributary of the transboundary Unuk River. Fish have never been documented above a 200 m cascade barrier in Sulphurets Creek, 20 km downstream of the outlet from Brucejack Lake. Chinook, coho, and sockeye salmon, and Dolly Varden char are documented below the cascade barrier in the Unuk River. The Unuk River supports runs of Chinook, coho, pink, chum and sockeye salmon, which support commercial, recreational, and subsistence fisheries in Alaska.

Based on our participation throughout the environmental assessment process and our review of the DEAR, the State finds no basis on which to object to CEAA's conclusion that it is unlikely that any impacts from water quality degradation to fish and fish habitat will be observable. The State supports CEAA's recommendation that water quality monitoring at the outlet of Brucejack Lake into Brucejack Creek be implemented to verify the effectiveness of the proposed water treatment process. In the event that the monitoring shows that the treatment process is not effective in preventing harm to Alaskan waters and fish habitat, the State reserves the right to take appropriate action to address the situation.

Cumulative Effects

As described in Section 7.3.8 of the DEAR, the State expressed concerns during the environmental assessment process regarding potential cumulative effects on water quality and fishery resources in the Unuk River. In response, the Project Proponent updated their water quality effects assessment and completed additional analyses to describe potential cumulative effects in Sulphurets Creek and the Unuk River (memo dated January 23, 2015). On January 29, 2015, CEAA facilitated a meeting with the Brucejack Working Group to review and discuss the updated and additional water quality analyses. The State's earlier concerns regarding potential cumulative effects have been addressed by CEAA and the Project Proponent.

Based on our participation throughout the environmental assessment process and our review of the DEAR, the State finds no basis on which to object to CEAA's conclusion that the Brucejack Project would not result in any significant adverse environmental effects outside of Canada. However, the State reserves the right to take necessary actions in the event that the Project causes adverse environmental effects to Alaska.

Environmental Monitoring

If future environmental monitoring of the Project during construction, operation, or post-closure indicates that significant adverse impacts are likely to affect water quality or fish resources in Alaska, the State expects appropriate and immediate corrective actions to be taken by the Project

Proponent and the appropriate provincial and federal Canadian regulatory agencies, in consultation with the State of Alaska.

Sincerely,



Ed Fogels
Deputy Commissioner

CC:

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